



January 23, 2025

**VIA ECF**

Hon. Rukhsanah L. Singh, U.S.M.J.  
Clarkson S. Fisher Building  
& U.S. Courthouse  
402 East State Street, 7W  
Trenton, New Jersey 08608

**Re: Capelogic, Inc. v. Markit Group Limited, No. 22-cv-85 (ZNQ-RLS)**

Dear Judge Singh:

This firm represents Defendant Markit Group Limited in the above-referenced matter. As discussed with Your Honor during the January 16, 2025 status conference, counsel for Plaintiff and Defendant have conferred and submit for Your Honor's approval the below procedure and schedule for summary judgment and expert discovery.

1. Defendant shall file a motion for summary judgment limited to its contractual limitations period defense on or before **February 24, 2025**.
2. Plaintiff shall file its opposition to Defendant's motion for summary judgment on or before **March 31, 2025**.
3. Defendant shall file its reply in further support of its motion for summary judgment on or before **April 15, 2025**.
4. The parties have agreed to refer the above-referenced motion for summary judgment to Magistrate Judge Rukhsanah L. Singh for final disposition, and shall file the form necessary to effect that referral after the motion is filed.
5. Expert discovery shall not be stayed pending the resolution of the above-referenced motion for summary judgment and shall proceed in accordance with the following schedule:
  - a. Plaintiff's affirmative expert disclosures shall be served on or before **April 11, 2025**.
  - b. Defendant's responsive expert disclosures shall be served on or before **June 13, 2025**.
  - c. Expert depositions shall be completed by **August 12, 2025**.
6. In the event the motion for summary judgment referenced above does not dispose of this action, Defendant shall be permitted to file a second motion for summary judgment following the completion of expert discovery directed to the balance of

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any arguments Defendant may have. After the completion of expert discovery, the parties will confer and submit to the Court for approval a briefing schedule for such motion, should it be necessary.

If the foregoing meets with Your Honor's approval, the parties respectfully request that this letter be So Ordered. The parties thank the Court for its continuing attention to this matter.

Respectfully submitted,

s/ Samuel I. Portnoy

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cc: All Counsel of Record (via CM/ECF)

**It is SO ORDERED.**

Dated: January 24, 2025

  
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Hon. Rukhsanah L. Singh  
United States Magistrate Judge

\* The Clerk of the Court shall RE-OPEN this matter and restore it to the Court's active docket.